

EXHIBIT A

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 13**

TINLEY PARK HOTEL AND CONVENTION CENTER, LLC

And

Case 13-CA-141609

AUDELIA SANTIAGO, an Individual

MOTION FOR STAY

Respondent, Tinley Park Hotel and Convention Center, LLC ("Tinley Park"), by its attorneys, Laura A. Balson and Brianna L. Golan of Golan Christie Taglia LLP, hereby moves for a stay of the National Labor Relations Board ("NLRB")'s January 8, 2019 Decision and Order (the "Order"), and in support states as follows:

1. On November 25, 2014, Audelia Santiago filed a charge against Tinley Park before the NLRB, alleging that Santiago's employment was terminated for engaging in protected concerted activity.
2. After a hearing, the NLRB issued its ruling on June 16, 2015, and found in favor of Santiago. Both the NLRB's General Counsel and Tinley Park filed exceptions to this ruling.
3. On January 8, 2019, Chairman Ring and Members McFerran and Emanuel issued the Order, which affirmed the prior ruling.
4. Under the Order, Tinley Park is to take certain affirmative actions within fourteen (14) days of the issuance of the Order.
5. On January 17, 2019, Tinley Park filed a Petition to Review the Decision with the United States Court of Appeals for the Seventh Circuit (the "Appeal").
6. Pursuant to 29 U.S.C. §160(g), the commencement of the appeal does not operate as a stay of the Order.

7. Therefore, Tinley Park respectfully requests that the NLRB stay the enforcement of the Order pending a ruling on the Appeal.

WHEREFORE, Tinley Park Hotel and Convention Center respectfully request that this Honorable Board enter an order:

- A. staying the enforcement of the Decision and Order entered on January 8, 2019, pending a ruling by the Appellate Court on the appeal filed by Tinley Park; and;
- B. granting any further and additional relief that may be appropriate and just.

Dated: February 13, 2019

Respectfully submitted,

By 

Laura A. Balson, Esq.

Brianna L. Golan, Esq.

GOLAN CHRISTIE TAGLIA LLP

70 West Madison Street, Suite 1500

Chicago, Illinois 60602

(312) 263-2300

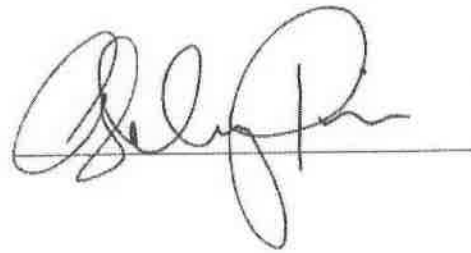
*Attorneys for Tinley Park Hotel &
Convention Center, LLC*

CERTIFICATE OF SERVICE

I, Ashley Prior, a non-attorney, hereby certify that copies of the Motion for Stay have been electronically filed with the Office of the Executive Secretary/Board and served upon the following parties via electronic and U.S. mail, postage prepaid, this 13th day of February, 2019.

R. Jason Patterson, Esq.
Andrea James, Esq.
Counsel for the General Counsel
NLRB - Region 13
219 South LaSalle Street, Suite 900
Chicago, Illinois 60604
Jason.Patterson@nrlb.gov
Andrea.James@nrlb.gov

Alexis Martin, Esq.
Caffarelli & Associates, Ltd.
224 South Michigan Avenue, Suite 300
Chicago, Illinois 60604
amartin@caffarelli.com

A handwritten signature in black ink, appearing to read 'Ashley Prior', is written over a horizontal line.